

RUSANOVA LAW OFFICE, LLC

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December 11, 2023

To Honorable Christopher M. Alston
U.S. Bankruptcy Judge
U.S. Bankruptcy Court
700 Stewart Street, Room 6301
Seattle, WA 98101

Re: Nina Koshur, # 23-10708-CMA
Motion to Withdraw
Confirmation of Chapter 13 Plan Feasibility
Hearing set: January 11, 2024, at 9:30 am

Dear Judge Alston,

Hereby, I respectfully request a Court leave to continue the Confirmation Hearing currently scheduled on January 11, 2024, at 9:30 am.

The hearing agenda is to confirm the feasibility of the Chapter 13 Plan. However, we are disputing the creditor Progressive claim, which is almost 60% of the total debtor's liability. Currently, there is ongoing litigation in King County Superior Court. The debtor has filed the Petition for Injunction, which if granted will stay execution of the Judgment against Nina Koshur (Progressive claim). This will directly affect Chapter 13 Bankruptcy Plan feasibility. Continuation of the hearing will not prejudice creditors, nor will it create unnecessary delay on the case.

All the documents for the Creditors meeting were provided to the Trustee's office. Post-conversion schedules, Notice of Objection to Claim, and Chapter 13 Plan, will be filed with Court and served to all parties involved in timely manner.

Sincerely,



Irina Rusanova
Attorney at Law
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